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September 23, 2022

VIA ECF

The Honorable Katherine Polk Failla  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: *Iowa Pub. Emps.' Ret. Sys. et al. v. Bank of Am. Corp. et al.*, No. 17-cv-6221 (KPF-SLC)

Dear Judge Failla:

Plaintiffs respectfully request leave to file their response to Defendants' Objections to Magistrate Judge Sarah L. Cave's Report and Recommendation (ECF No. 576) under interim seal, and to file a motion to seal along with proposed and redacted and highlighted copies by October 14.

Plaintiffs request to file their response to Defendants' Objections to Judge Cave's Report and Recommendation in redacted form as it contains references to materials and documents that have been designated as Highly Confidential or Confidential pursuant to the Protective Order in this case (ECF Nos. 150, 228). Defendants likewise sought leave to file their Objections under seal (ECF No. 575), and the Court granted their request (ECF No. 578).

We have conferred with counsel for Defendants, who consent to our request.

Respectfully submitted,

/s/ Michael B. Eisenkraft

Michael B. Eisenkraft

COHEN MILSTEIN SELLERS & TOLL  
PLLC

/s/ Daniel L. Brockett

Daniel L. Brockett

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

Application GRANTED. Plaintiffs shall file their motion to seal along with proposed redacted and highlight copies by October 14, 2022. The Court understands that the response will be viewable by the Court and parties only.

The Clerk of Court is directed to terminate the motion at docket entry 591.

SO ORDERED.

Dated: September 26, 2022  
New York, New York

A handwritten signature in blue ink, reading "Katherine Polk Failla".